

United States Courts Southern
District of Texas
FILED

October 4, 2023

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

UNITED STATES OF AMERICA

v.

Criminal No. M-23-1248-S1

MARIO REYES

~~KEVIN GARZA~~ KEVIN URIEL GARZA

JORGE LUIS VELASQUEZ

JULIO CESAR RODRIGUEZ-AZUA, JR.

CARLOS MIGUEL PEREZ-GONZALEZ

VANESSA RAMOS-BARRERA

ANASTACIO RUIZ, JR.

SECOND AMENDED SEALED SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about July 11, 2023 and continuing through at least September 29, 2023 in the Southern District of Texas, Defendants,

MARIO REYES

and

~~KEVIN GARZA~~

KEVIN URIEL GARZA

did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the grand jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956(a)(2)(A), to wit: to transport, transmit, transfer, or attempt to transport, transmit, or transfer a monetary instrument or funds from a place outside the United States to or through a place inside the United States with the intent to promote the carrying on of specified unlawful activity, namely, the smuggling of goods contrary to Title 18, United States Code, Section 554.

In violation of Title 18, United States Code, Section 1956(h).

Count Two

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Count Three

From on or about February 7, 2023 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

~~KEVIN GARZA~~

KEVIN URIEL GARZA

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 11,480 rounds of .50 caliber ammunition, 11,220 rounds of 7.62x39mm caliber ammunition, 4,000 rounds of 5.56mm caliber ammunition; and 3,000 rounds of .38 super caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States

Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Four

On or about August 8, 2023, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

JORGE LUIS VELASQUEZ

did fraudulently and knowingly export and send from the United States or attempt to export and send from the United States to the United Mexican States, any merchandise, article, or object, to wit: approximately 1,500 rounds of .50 caliber ammunition, contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Five

From on or about July 11, 2023 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

MARIO REYES

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 6,200 rounds of .50 caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Six

From on or about August 19, 2021 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

JULIO CESAR RODRIGUEZ-AZUA, JR.

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 631,000 rounds of 7.62x39 caliber ammunition, 235,000 rounds of .223 caliber ammunition, 10,000 rounds of .308 caliber ammunition, and 1,000 rounds of 5.7x28mm ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Seven

From on or about September 8, 2021 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

CARLOS MIGUEL PEREZ-GONZALEZ

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 285,000 rounds of 7.62x39 caliber ammunition, 105,000 rounds of .223 caliber ammunition, and 1,000 rounds of 5.7x28mm ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Eight

On or about August 17, 2023, in the Southern District of Texas and within the jurisdiction of
the Court, defendant,

CARLOS MIGUEL PEREZ-GONZALEZ

knowingly being an alien who was illegally and unlawfully in the United States, did knowingly possess in and affecting interstate and foreign commerce, a firearm, namely, one Glock, Model 21, .45 caliber handgun.

In violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(8).

Count Nine

[illegible]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Count Ten

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Counts Eleven through Fifteen

On the following dates, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

VANESSA RAMOS-BARRERA

knowingly made a false statement and representation to Glick Twins, a federally licensed firearm dealer in Pharr, Texas, with respect to information required to be kept in the records of said federally licensed firearms dealer, in that the Defendant did execute a Bureau of Alcohol, Tobacco, Firearms, and Firearms Form 4473, Firearms Transaction Record, representing that her residence and address was at specified address in Channelview, Texas, when in truth and fact it was not her residence or address;

Count	Date	Firearm to be Acquired
11	December 28, 2022	Riley Defense, RAK-47, 7.62x39mm caliber rifle
12	February 28, 2023	Glock, Model 42, .380 caliber pistol and a Smith & Wesson, Model .380 Shield, .380 caliber pistol
13	January 24, 2023	Taurus, Model TX22, .22LR caliber pistol and a Ruger, Model LCP, .380 caliber pistol
14	February 15, 2023	Glock, Model 48, 9mm caliber pistol and a Ruger, Model LCP II, .380 caliber pistol
15	December 6, 2022	Romarm CAI, Model Micro Draco, 7.62 caliber pistol

Each in violation of Title 18, United States Code, Section 924(a)(1)(A).

Count Sixteen

On the following dates, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

ANASTACIO RUIZ, JR.

received and possessed a firearm, namely, a Harrington & Richardson, Model 88, 12 gauge shot gun having a barrel of less than 18 inches in length and an overall length of less than 26 inches in length, not registered to Defendant in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5841, 5845(a), 5861(d), and 5871.

NOTICE OF FORFEITURE
19 U.S.C. § 1595a(d) and 28 U.S.C. § 2461

Pursuant to 19 U.S.C. § 1595a(d), 18 U.S.C. § 924(d)(1), 26 U.S.C. § 5872, and 28 U.S.C. § 2461 the United States gives notice to defendants,


MARIO REYES

KEVIN UREIL GARZA
~~KEVIN GARZA~~
JORGE LUIS VELASQUEZ
JULIO CESAR RODRIGUEZ-AZUA, JR.
CARLOS MIGUEL PEREZ-GONZALEZ
and
ANASTACIO RUIZ, JR.

that upon conviction of a violation of Title 18 U.S.C. §554, as charged in this Indictment, all merchandise exported or sent from the United States or attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be forfeited to the United States and includes, but is not limited to the following:

a Taurus, Model Millennium G2, 9mm caliber pistol;

a Taurus Model PT-101, .40 caliber pistol;

a Harrington & Richardson, Model 88, 12 gauge shot gun;

approximately 1,500 rounds of .50 caliber ammunition seized on August 8, 2023;

approximately 10,000 rounds of 7.62 x 39 caliber ammunition seized on August 17, 2023;

approximately 34 rounds of .45 caliber ammunition seized on August 17, 2023;

approximately 1,800 rounds of .50 caliber ammunition seized on August 18, 2023;

approximately 15,021 rounds of 7.62 x 39 caliber ammunition seized on August 18, 2023; and

approximately 150 rounds of .50 caliber ammunition seized on August 30, 2023

that upon conviction of a violation of Title 18 U.S.C. § 922(g)(5)(A), all firearms and ammunition involved in said violation are subject to forfeiture, including, but not limited to, the following:

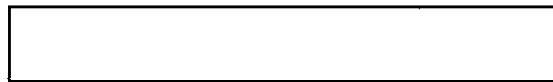
a Glock, Model 21, .45 caliber handgun

and that upon conviction of a violation of Title 26, United States Code, Sections 5841, 5845(a), 5861(d), and 5871 all firearms involved in said violation are subject to forfeiture, including, but

not limited to, the following:

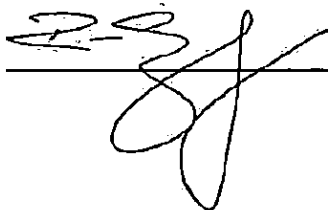
a Harrington & Richardson, Model 88, 12 gauge shot gun

A TRUE BILL



FOREPERSON

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY



ATES ATTORNEY